

EXHIBIT A

Archived: Thursday, April 28, 2016 5:14:25 PM
From: Simpson, Lisa T.
Sent: Wednesday, November 11, 2015 10:32:00 PM
To: mkamber; Beth Egan; DALVIK-KVN
Cc: Oracle/Google-OHS Only
Subject: RE: Deposition Scheduling
Importance: Normal

Dear Matthias –

Thank you for getting dates for the witnesses we have identified. We would appreciate dates for our 30(b)(6) as soon as possible, and no later than Friday, as we would like to get that on the calendar before we start taking up available dates with the various fact witnesses.

We will work on getting dates for the witnesses you have listed. We decline your invitation to identify additional witnesses you may be “missing.”

As we mentioned at the meet and confer, we do not intend to call the lawyers on our list (Sarboraria, Simion and Angioletti) unless Google persists in arguing that there were no discussions of copyright at the pre-lawsuit meeting between Oracle and Google. As we have indicated, we think such an argument is not only improper under Rule 408, it is incorrect. This topic is also well outside the date range that you have been advocating as it involved pre-2011 discussions. Has Google reconsidered its position, such that it is now taking the position that pre-2011 information is fair game for deposition inquiry? Please let us know if you continue to need deposition dates for Sarboraria and Simion as you indicate below.

With respect to topic 4 of Google’s 30(b)(6) to Oracle, Edward Senteno will be the witness. We will follow up with a more formal designation.

Lisa

From: Matthias Kamber [mailto:MKamber@kvn.com]
Sent: Wednesday, November 11, 2015 3:05 PM
To: Beth Egan; Simpson, Lisa T.; DALVIK-KVN
Cc: Oracle/Google-OHS Only
Subject: RE: Deposition Scheduling

Dear Lisa,

Following up on your email below and what I understand was discussed at the Court yesterday morning, we are polling the Google employees you list below (including Henrique de Castro) for their availability and will get you dates as soon as possible. Furthermore, we are also working to line up dates and witnesses for Oracle’s 30(b)(6) topics; however, that deposition will not be proceeding on the noticed date (this Friday, Nov. 13th).

With respect to the newly disclosed current/former Oracle employees, please provide us with deposition availability for the following:

1. Terrence Barr